

**IN THE UNITED STATES DISTRICT COURT FOR THE  
WESTERN DISTRICT OF MISSOURI  
WESTERN DIVISION**

DON GIBSON, LAUREN CRISS, and )  
JOHN MEINERS, and DANIEL UMPA, )  
individually and on behalf of all others )  
similarly situated, )  
   )  
Plaintiffs, )      Case No. 4:23-cv-00788-SRB  
   ) [Consolidated with 4:23-cv-00945-SRB]  
v. )  
   )      Judge Stephen R. Bough  
NATIONAL ASSOCIATION OF )  
REALTORS, *et al.*, )  
   )  
Defendants

**NOTICE OF PENDING SETTLEMENT AND JOINT MOTION TO STAY CASE AS TO  
THE KEYES COMPANY AND ILLUSTRATED PROPERTIES, LLC**

Plaintiffs Don Gibson, Lauren Criss, John Meiners, and Daniel Umpa (collectively “Plaintiffs”), and defendants The Keyes Company (“Keyes”) and Illustrated Properties, LLC (“Illustrated”, and together with Keyes and Plaintiffs, the “Parties”) respectfully provide notice to the Court that Plaintiffs have reached an agreement with Keyes and Illustrated to settle all claims asserted against them in the above-captioned consolidated action as part of a proposed nationwide class settlement. The settlement was jointly negotiated with counsel for all Plaintiffs. This agreement is subject to the Court’s approval under Federal Rule of Civil Procedure 23. Consistent with the Parties’ agreement, Plaintiffs will promptly file a motion in this Court for preliminary approval of the proposed settlement.

As provided by the agreement, the Parties hereby jointly stipulate and request that the Court stay all deadlines and proceedings solely as to Keyes and Illustrated to preserve the resources of Plaintiffs, Keyes, Illustrated, and the Court, and to seek preliminary and final approval of the settlement.

Dated: September 3, 2024

Respectfully submitted by:

/s/ Steve W. Berman

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***Attorneys for Defendants The Keyes Company and  
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**CERTIFICATE OF SERVICE**

I hereby certify that on September 3, 2024, I electronically filed the foregoing document with the Clerk of the Court using the CM/ECF system, which will send a notice of electronic filing to counsel of record for this case.

*/s/ Timothy J. McGinn*  
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Timothy J. McGinn

*Attorney for Defendants The Keyes Company and  
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